

THOMAS D. SANGREY and	:	IN THE
AIMEE I. SANGREY, his wife	:	CIRCUIT COURT
COMPLAINANTS	:	FOR
VS.	:	FREDERICK COUNTY
HOWELL C. HAPP, JR. and	:	MARYLAND
SHIRLEY L. HAPP, his wife	:	
RESPONDENTS	:	NO. 26,050 EQUITY
	:	

ANSWERS TO INTERROGATORIES

Now comes Thomas D. Sangrey and Aimee I. Sangrey, his wife, by Offutt & Haugh, P.A. and George T. Horman, their attorneys, and for Answer to the Interrogatories propounded against them in this case say:

1. When did you acquire the property which is the subject matter of the suit filed herein against Mr. and Mrs. Happ and who did you acquire it from?

RESPONSE:

We acquired the subject property by deed from Charles B. Miller and Louise W. Miller, his wife, said deed being dated September 9, 1974, and recorded among the Land Records of Frederick County, Maryland in Liber 947, folio 514.

2. Were you shown the property lines of your property at the time you purchased it?

- (a) If so, who showed you these property lines?
- (b) If so, how were these property lines marked?
- (c) If not, how did you know where the property lines were?

RESPONSE: Yes.

(a) In August, 1974 the property lines were shown to us by Julian T. Ingalls, Agent for Robert W. Bridges, Inc., which company was working in cooperation with the Ned Zieler agency with who the property was listed.

(b) The following is a description of the property markings found upon inspection of the property boundary lines with Mr. Ingalls: We started at the corner of the Eaton and Miller adjoining property line at a metal post, proceeded along Ridge Road approximately 95 feet north to a tall metal post, then proceeded down the side line approximately 220-223 feet to a small metal post; proceeded across back line through some evergreens approximately 100 feet - no post was found at this corner - we then proceeded back to metal post at the corner of the Eaton and